

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO.

B-20-861

PASCALE CECILE VERONIQUE FERRIER §
aka Jane Ferrier

United States District Court
Southern District of Texas
FILED

INDICTMENT

DEC 14 2020

THE GRAND JURY CHARGES:

David J. Bradley, Clerk of Court

COUNT ONE

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Deputy Warden Alexander Sanchez, El Valle Detention Facility.

In violation of Title 18 United States Code Section 175(a).

COUNT TWO

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a

biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Sheriff J. E. "Eddie" Guerra, Hidalgo County Sheriff's Office.

In violation of Title 18 United States Code Section 175(a).

COUNT THREE

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Corporal Ashley Ibarra, Hidalgo County Adult Detention Center.

In violation of Title 18 United States Code Section 175(a).

COUNT FOUR

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Sergeant Cynthia Casanova, Hidalgo County Adult Detention Center.

In violation of Title 18 United States Code Section 175(a).

COUNT FIVE

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Corporal Veronica Bueno, Hidalgo County Adult Detention Center.

In violation of Title 18 United States Code Section 175(a).

COUNT SIX

On or about September 16, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Warden, Brooks County Detention Center.

In violation of Title 18 United States Code Section 175(a).

COUNT SEVEN

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and

attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Sheriff Urbino "Benny" Martinez, Brooks County Sheriff's Office.

In violation of Title 18 United States Code Section 175(a).

COUNT EIGHT

On or about September 21, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly develop, produce, stockpile, transfer, acquire, retain and possess, and attempted to develop, produce, stockpile, transfer, acquire, retain and possess a biological agent, toxin, and delivery system, for use as a weapon, to wit, ricin, which was sent in an envelope to Chief Robert Dominguez, Mission Police Department.

In violation of Title 18 United States Code Section 175(a).

COUNT NINE

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Deputy Warden Alexander Sanchez, El Valle Detention Facility, specifically stating in part, "I made a 'Special Gift' for you, which is in this letter. But if it doesn't work, I will find another recipe for another poison".

In violation of Title 18 United States Code Section 875(c).

COUNT TEN

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Sheriff J. E. "Eddie" Guerra, Hidalgo County Sheriff's Office, specifically stating in part, "I made a 'Special Gift' for you..., which is in this letter....If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I will be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT ELEVEN

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Corporal Ashley Ibarra, Hidalgo County Adult Detention Center, specifically stating in part, "...I made a Special Gift' for you, which is in this letter. If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT TWELVE

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Sergeant Cynthia Casanova, Hidalgo County Adult Detention Center, specifically stating in part, "...I made a 'Special Gift' for you, which is in this letter. If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT THIRTEEN

On or about September 15, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Corporal Veronica Bueno, Hidalgo County Adult Detention Center, specifically stating in part, "...I made a 'Special Gift' for you, which is in this letter. If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT FOURTEEN

On or about September 16, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, the Warden of the Brooks County Detention Center, specifically stating in part, "...I made a 'Special Gift' for you, which is in this letter. If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT FIFTEEN

On or about September 14, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,

did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Sheriff Urbino "Benny" Martinez, Brooks County Sheriff's Office, specifically stating in part, "...I made a 'Special Gift' for you, which is in this letter. If it doesn't work, I will find a better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

COUNT SIXTEEN

On or about September 21, 2020, in the Southern District of Texas and elsewhere,
Defendant,

PASCALE CECILE VERONIQUE FERRIER
aka Jane Ferrier,


did knowingly and willfully transmit in interstate and foreign commerce a communication, a letter, containing a threat to injure the person of another, to wit, Chief Robert Dominguez, Mission Police Department, specifically stating in part, "...I made a 'Special Gift' for you, which is in this letter. If it doesn't work, I will find a 'better recipe for another poison, or I might use my gun when I'll be able to come".

In violation of Title 18 United States Code Section 875(c).

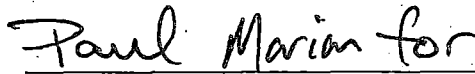
A TRUE BILL:

FOREPERSON OF THE GRAND JURY


RYAN K. PATRICK
UNITED STATES ATTORNEY



DAVID A. CORONADO
Assistant United States Attorney



DAVID A. LINDENMUTH
Assistant United States Attorney



ALAMDAR S. HAMDANI
Assistant United States Attorney